

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

EUSTOLIA GAYTAN, an individual,)	Case No. 2:24-cv-00470-JCC
)	
Plaintiff,)	STIPULATION FOR
)	CONTINUANCE OF TRIAL DATE
v.)	AND CASE DEADLINES
)	
LOWE'S HOME CENTERS, LLC, a foreign)	NOTE ON MOTION CALENDAR:
Limited Liability Company dba LOWE'S)	December 30, 2024
HOME IMPROVEMENT, and "JOHN DOE)	
CORPORATION(S) XYZ 1-10", jointly and)	
severally,)	
)	
Defendants.)	

COME NOW all parties, by and through their respective counsel of record, and stipulate to the continuance of the trial date and certain case deadlines.

The parties respectfully request the Court issue an amended case scheduling order with the following deadlines:

Deadline for Joining Additional Parties:	<i>Completed</i>
Deadline for Amending Pleadings:	<i>Completed</i>
Discovery deadline:	February 28, 2025
Reports of Experts due:	By discovery cutoff date
Mediation deadline:	March 3, 2025
Dispositive Motions filed by:	March 10, 2025

STIPULATION FOR CONTINUANCE OF TRIAL DATE AND CASE DEADLINES

DAVIS ROTHWELL
EARLE & XÓCHIHUA, P.C.
200 SW MARKET ST, SUITE 1800
PORTLAND, OREGON 97201
T (503) 222-4422 F (503) 222-4428

1 Motions in Limine filed by: May 30, 2025

2 Pretrial Order due: May 30, 2025

3 Proposed verdict forms, voir dire and jury instructions due: June 2, 2025

4 Trial briefs to be submitted by: June 5, 2025

5 Jury Trial (or ready for trial after): June 9, 2025

6 The parties request this continuance due to the following reasons: upon obtaining medical
 7 discovery, the parties observed references to prior medical consultation for some of the same
 8 types of issues asserted in the lawsuit (back pain) and are still attempting to locate the records
 9 that are referenced, which records are key to the damages issues in this matter. Defendant held a
 10 first session of the deposition of the Plaintiff, which deposition went significantly slower than
 11 anticipated and could not be completed prior to the holidays, and the holiday season is interfering
 12 with completion of discovery more than had been anticipated. In addition, Counsel for Defendant
 13 is in the Navy Reserves as the sole Judge Advocate for the Navy Emergency Preparedness
 14 Liaison Office (“NEPLO”), providing legal counsel to the more than 130 members of the
 15 NEPLO program, as well as Active Duty installation commanders, and which program provides
 16 military emergency support for domestic crises. Counsel has been requested to be on call from
 17 January 6-20 for the Presidential Inauguration, has been given orders for military duty from
 18 January 26 through February 2 for the NEPLO National Exercise, and has been requested for
 19 further military duty from April 21 through May 2, 2025 for the NEPLO Hurricane Preparedness
 20 Exercise (HURREX).

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25
 Page 2 **STIPULATION FOR CONTINUANCE OF TRIAL DATE AND
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1 ///

2 ///

3 The parties are agreeable to a short postponement of the trial and affiliated deadlines in
4 this case to allow for discovery to be completed, and for mediation at a time that will not conflict
5 with Defense counsel's military obligations, and anticipate that this adjustment will provide the
6 parties with a better opportunity to try to resolve this matter.

7 IT IS SO ORDERED this 2nd day of January, 2025

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Honorable Judge John C. Coughenour

13 SUBMITTED this 30th day of December, 2024

14 **DUBIN LAW GROUP**

15 s/Falin McKenzie
16 Falin McKenzie, WSBA #56067
17 P.O. Box 30947
18 Seattle, WA 98113
19 Phone : 206-800-8000
Fax : 206-973-1783
E-Mail: fa1in@dubinlawoffice.com
Of Attorneys for Plaintiff

20 **DAVIS ROTHWELL
EARLE & XÓCHIHUA, P.C.**

21 s/ Keith M. Liguori
22 Keith M. Liguori, WSBA #51501
23 701 5th Ave Ste 5500
24 Seattle, WA 98104
206-622-2295
kliguori@davisrothwell.com

25 s/ Heather C. Beasley

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**DAVIS ROTHWELL
EARLE & XÓCHIHUA, P.C.**
200 SW MARKET ST, SUITE 1800
PORTLAND, OREGON 97201
T (503) 222-4422 F (503) 222-4428

Heather C. Beasley, WSBA #31942
200 SW Market Street, Suite 1800
Portland, OR 97201
503-222-4422
hbeasley@davisrothwell.com
Counsel for Defendant Lowe's
Home Centers, LLC dba Lowe's
Home Improvement

CM/ECF CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2024, I electronically filed the foregoing **STIPULATION FOR CONTINUANCE OF TRIAL DATE AND CASE DEADLINES** using the CM/ECF system, which caused the following attorney(s) to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Falin McKenzie, WSBA#56067
Dubin Law Group
P.O. Box 30947
Seattle, WA 98113
Phone : 206-800-8000
Fax : 206-973-1783
E-Mail: falin@dubinlawoffice.com
Jenn@dubinlawoffice.com
Of Attorneys for Plaintiff

DATED this 30th day of December, 2024.

DAVIS ROTHWELL
EARLE & XÓCHIHUA, P.C.

s/ Keith M. Liguori
Keith M. Liguori, WSBA #51501
701 5th Ave Ste 5500
Seattle, WA 98104
206-622-2295
kliguori@davisrothwell.com

s/ Heather C. Beasley
Heather C. Beasley, WSBA #31942
200 SW Market Street, Suite 1800

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EARLE & XÓCHIHUA, P.C.
200 SW MARKET ST, SUITE 1800
PORTLAND, OREGON 97201
T (503) 222-4422 F (503) 222-4428

Portland, OR 97201
503-222-4422
hbeasley@davisrothwell.com
Counsel for Defendant Lowe's Home
Centers, LLC dba Lowe's Home
Improvement